

Whistleblowing Policy and Procedure

The Company has put in place a whistleblowing policy which provides well-defined and accessible channels. We and our subsidiary companies are committed to the highest standards of quality, honesty and accountability.

This policy applies to all permanent and short-term employees of the Group. It also applies to external consultants, contractors and agency staff whilst working within the Group

The objective of the policy and procedure is to provide and facilitate a mechanism for any whistle-blower to report concern about any suspected and/or known misconduct, wrongdoings, corruption, fraud, waste and/or abuse which may include the following examples of issues:

- Conflict of interest, insider trading and collusion with competitors
- Unauthorized use of Company/Group's money, properties and/or facilities
- Non-compliance with the Company's policies and procedures and/or code of conduct
- Negligence/malpractice
- Disclosure of Company's information without proper authorization
- Commission of acts which intimidate, harass and/or victimise any members of the Board of Directors, Management or staff of the Company
- Abuse of position
- Involvement in conflict of interest and/or business opportunities positions
- Commission of unlawful acts
- Exposure of Company's properties, facilities and/or staff to the risks of safety and security
- Failure to meet professional standard
- Unsafe work practices or any other matters involving corruption employee misconduct.

Anonymous Reporting

The whistle blower may identify himself or if he prefers, to remain anonymous when reporting suspected and/or known misconduct, wrongdoings, corruptions, fraud, waste and/or abuse.

Confidentiality

The identity of the whistle blower and all concerns raised would be treated as private and confidential in order to protect the whistle blower from victimisation or harassment arises from the reporting. However, the whistle blower may be required to come forward as a witness in accordance with any applicable laws and regulations.

Any employee reporting on any concern must make it good faith with reasonable belief that it is true, without malicious or false allegation and not for personal gain. Any employee found to make false and malicious allegation shall be subjected to disciplinary actions by the Company and/or legal action by the Company.

Procedure

- a. Any concern should be reported to the immediate superior. However, if it is not possible or appropriate to do so, the concern should then be reported to the Group Managing Director.
- b. Any concern that deemed not appropriate to be reported to the immediate superior should be raised to the attention of the Independent, Non-executive Chairman or the Audit Committee Chairman.
- c. Upon receipt of the concern, the Group Managing Director or the Independent, Non-executive Chairman (depending on who is the recipient of the reporting) shall set up an investigating team (“investigators” to conduct investigation on the issue/concern raised.
- d. The progress of the investigation shall be reported to the Group Managing Director or the Independent Non-executive Chairman
- e. Upon completion of the investigation, the investigators shall submit their full report together with recommendation to the Group Managing Director or the Independent Non-executive Chairman or the Audit Committee Chairman.
- f. Action mandated shall be carried out accordingly

Monitoring Policy

Confidential records will be kept of all matters raised through and where appropriate the Audit Committee or Board of Directors will received report with an assessment of the effectiveness of the policy in dealing with individual matters.